

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
ABINGDON DIVISION

UNITED STATES OF AMERICA :


v. :

JEREMY WAYNE BARTLEY :  
DAWN ROSSALYN VINCENTE :  
a/k/a Dawn Rossalyn Wheaton :  
a/k/a Dawn Marie Coleman :  
SUMMER DEBORAH BOOHER :  
STEVEN ROGER BRYANT :  
DAKOTA WAYNE BARKER :  
CARRIE TAYLOR :  
BRANDIN TRAVIS HYDE :  
JEFFERY BRUCE BARTLEY :  
FRANKLIN DEE ROSE :  
STACEY LEE DOANE :  
MATTHEW CHARLES BLEVINS :  
ROBERT EDWARD BOWMAN :  
MELISSA MENDORA HARLESS :  
CONNIE DIANE STROUTH :  
DONNA JENKINS :  
a/k/a DONNA WHEATON :

Case No. 1:16CR1  
Violations: 18 U.S.C. §§ 922, 924  
21 U.S.C. §§ 841, 843, 846

CLERK'S OFFICE U.S. DIST. COURT  
AT ABINGDON, VA  
FILED

JAN 11 2016

JULIA C. DUDLEY, CLERK  
BY:   
DEPUTY CLERK

INDICTMENT

COUNT ONE

The Grand Jury charges that:

1. On or about and between January 1, 2014, and January 11, 2016, in the Western District of Virginia and elsewhere, DAWN ROSSALYN VINCENTE, SUMMER DEBORAH BOOHER, STEVEN ROGER BRYANT, DAKOTA WAYNE BARKER, JEREMY WAYNE BARTLEY, CARRIE TAYLOR, BRANDIN TRAVIS HYDE, JEFFERY BRUCE BARTLEY, FRANKLIN DEE ROSE, STACEY LEE DOANE, MATTHEW CHARLES BLEVINS, ROBERT EDWARD BOWMAN, MELISSA MENDORA HARLESS, CONNIE DIANE

STROUTH, DONNA JENKINS, and others known and unknown to the grand jury, conspired to manufacture, distribute, and possess with the intent to distribute a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841, and to knowingly and intentionally use a communications facility in committing, causing and facilitating a felony drug trafficking offense, in violation of Title 21, United States Code, Section 843(b).

2. As to DAWN ROSSALYN VINCENTE and JEREMY WAYNE BARTLEY, one of the objects of the conspiracy was to distribute and possess with the intent to distribute 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers.

3. All in violation of Title 21, United States Code, Sections 843, 846, 841(b)(1)(A), and 841(b)(1)(C).

### **COUNT TWO**

The Grand Jury charges that:

1. On or about April 14, 2015, in the Western District of Virginia and elsewhere, SUMMER DEBORAH BOOHER knowingly and intentionally possessed with the intent to distribute a mixture or substance containing methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance.

2. All in violation Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

### **COUNT THREE**

The Grand Jury charges that:

1. On or about June 23, 2015, in the Western District of Virginia and elsewhere, JEREMY WAYNE BARTLEY and BRANDIN TRAVIS HYDE, as principals and aiders and abettors, knowingly possessed a firearm, namely, a Tec-9 semi-automatic pistol, in or affecting interstate or foreign commerce, after having been convicted of a crime punishable by imprisonment for a term exceeding one year and while being an unlawful user of a controlled substance.

2. All in violation of Title 18, United States Code, Sections 2, 922(g)(1) and 922(g)(3).

#### **COUNT FOUR**

The Grand Jury charges that:

1. On or about July 16, 2015, in the Western District of Virginia and elsewhere, JEREMY WAYNE BARTLEY and BRANDIN TRAVIS HYDE, as principals and aiders and abettors, knowingly and intentionally possessed with the intent to distribute a mixture or substance containing methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance.

2. All in violation Title 18, United States Code, Section 2, and Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

#### **COUNT FIVE**

The Grand Jury charges that:

1. On or about July 16, 2015, in the Western District of Virginia and elsewhere, JEREMY WAYNE BARTLEY and BRANDIN TRAVIS HYDE, as principals and aiders and abettors, knowingly used and carried during and in relation to, and possessed in furtherance of, a drug trafficking crime for which they may be prosecuted in a court of the United States (distribute a substance containing methamphetamine, as set forth in Count Four), a firearm.

2. All in violation of Title 18, United States Code, Section 924(c).

#### **COUNT SIX**

The Grand Jury charges that:

1. On or about July 27, 2015, in the Western District of Virginia and elsewhere, DAWN ROSSALYN VINCENTE knowingly and intentionally distributed a mixture or substance containing methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance.

2. All in violation Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

#### **COUNT SEVEN**

The Grand Jury charges that:

1. On or about December 16, 2015, in the Western District of Virginia and elsewhere, DAWN ROSSALYN VINCENTE and DONNA JENKINS, as principals and aiders and abettors, knowingly and intentionally possessed with the intent to distribute a mixture or substance containing methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance.

2. All in violation Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

#### **COUNT EIGHT**

The Grand Jury charges that:

1. On or about December 21, 2015, in the Western District of Virginia and elsewhere, DAWN ROSSALYN VINCENTE and DONNA JENKINS, as principals and aiders and abettors, knowingly and intentionally possessed with the intent to distribute a mixture or substance containing methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance.

2. All in violation Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

#### **COUNT NINE**

The Grand Jury charges that:

1. On or about August 12, 2015, in the Western District of Virginia and elsewhere, FRANKLIN DEE ROSE knowingly and intentionally distributed a mixture or substance containing methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance.

2. All in violation Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

#### **COUNT TEN**

The Grand Jury charges that:

1. On or about April 9, 2015, in the Western District of Virginia and elsewhere, STACEY LEE DOANE knowingly and intentionally distributed a mixture or substance containing methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance.

2. All in violation Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

#### **COUNT ELEVEN**

The Grand Jury charges that:

1. On or about April 14, 2015, in the Western District of Virginia and elsewhere, STACEY LEE DOANE and MATTHEW CHARLES BLEVINS, as principals and aiders and abettors, knowingly and intentionally distributed a mixture or substance containing methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance.

2. All in violation Title 18, United States Code, Section 2, and Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT TWELVE**

The Grand Jury charges that:

1. On or about August 11, 2015, in the Western District of Virginia and elsewhere, MELISSA MEDOR HARLESS knowingly and intentionally distributed a mixture or substance containing methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance.

2. All in violation Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT THIRTEEN**

The Grand Jury charges that:

1. On or about April 21, 2015, in the Western District of Virginia and elsewhere, STACEY LEE DOANE knowingly and intentionally distributed a mixture or substance containing methamphetamine, its salts, isomers, or salts of its isomers, a Schedule II controlled substance.

2. All in violation Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**NOTICE OF FORFEITURE**

1. Upon conviction of one or more of the felony offenses alleged in this Indictment, the defendants shall forfeit to the United States:

- a. any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offenses, pursuant to 21 U.S.C. § 853(a)(1).

- b. any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of said offenses, pursuant to 21 U.S.C. § 853(a)(2).
- c. any firearm used or intended to be used to facilitate the transportation, sale, receipt, possession, or concealment of controlled substances and/or raw materials, as described in 21 U.S.C. § 881(a)(1) and (2), and any proceeds traceable to such property, pursuant to 21 U.S.C. § 881(a)(11) and 28 U.S.C. § 2461(c).
- d. any firearms and ammunition involved or used in the commission of said offenses, or possessed in violation thereof, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c).

2. The property to be forfeited to the United States includes but is not limited to the following property:

a. **United States Currency**

\$8,538.00

b. **Firearms**

Ruger P-95 9mm pistol

c. **Money Judgment:**

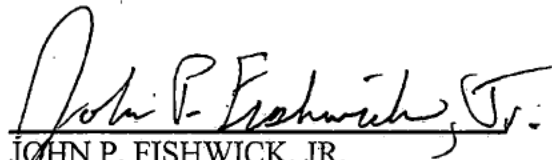
An amount not less than \$100,000.00

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States to seek forfeiture of any other property of the defendant up to the value of the above-described forfeitable property, pursuant to 21 U.S.C. § 853(p), including but not limited to above property.

A TRUE BILL, this 11<sup>th</sup> day of January, 2016.

  
JOHN P. FISHWICK, JR.  
United States Attorney

s/ Grand Jury Foreperson

by 